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June 7, 2019

VIA ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

Defendant Keith Raniere respectfully submits the attached proposed Requests to Charge. In addition to the proposed Request to Charge, Raniere requests that the Court charge the jury using the below instructions from Sand, *Modern Federal Jury Instructions*:

- Functions of the Court, the Jury and Counsel
- Role of the Court
- Role of the Jury
- Juror Obligations
- The Government as a Party
- Improper Considerations
- Publicity
- Jury to Consider Only This Defendant
- Presumption of Innocence and Burden of Proof
- Consider Only the Charges
- Reasonable Doubt
- Number of Witnesses and Uncontradicted Testimony
- Charts and Summaries
- Witness Credibility
- Law Enforcement Witness
- Good Faith Defense

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Ranieri reserves the right to request additional or different charges based on the remaining trial evidence.

Respectfully submitted,

/s/  
Marc A. Agnifilo, Esq., *Of Counsel*  
Teny R. Geragos, Esq.

/s/  
Paul DerOhannesian II, Esq.  
Danielle R. Smith, Esq.

cc: Counsel for the government (via ECF)